

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Amendment of the Commission's Rules to Promote)	WT Docket No. 19-140
Aviation Safety)	
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COMMENTS OF Eonti Inc.

September 3, 2019

I. EONTI INC.

- A. Eonti Inc., is headquartered in Lafayette, CO 80026 and provides trust management services to enable entity authentication, data encryption, and code signing capabilities to certified devices, safeguard data, and secure the integrity of service applications. Eonti is founded on years of experience in a variety of critical infrastructure sectors such as Communications (e.g., broadcasting, cable, wireless), Transportation (e.g., aviation, automotive), Energy (e.g., smart grid, utilities, charging stations), and Financial services (e.g., payment systems).
- B. Eonti provides end-to-end management services for the Aeronautical Mobile Airport Communication System (AeroMACS) Public Key Infrastructure (PKI). The PKI is foundation to secure AeroMACS communications on the airport surface and promote the overall safety and regularity of flight.

II. ELIGIBILITY (NPRM ¶ 38)

- A. ***The Commission's eligibility rules should encourage the robust deployment of AeroMACS services and should include the following:***
 - 1. **Airlines** will use AeroMACS to enable the wireless exchange of aircraft system data, help monitor aircraft health, reducing aircraft turnaround time, and to allow support the future growth in aircraft data seamlessly. Airlines should be included in the FCC's list of automatically eligible users of AeroMACS.
 - 2. **Aeronautical communications network providers ("ACNPs")**, which play an important role in facilitating communications in airports throughout the country, especially in smaller and regional airport hubs. To help facilitate the rapid and robust deployment of AeroMACS, ACNPs should be identified among the automatically eligible users of AeroMACS.
 - 3. **AeroMACS device Manufacturers** that plan to use AeroMACS for purposes of network development and product demonstrations on a temporary basis should be identified among the automatically eligible users of AeroMACS.

III. CHANNEL MANAGEMENT (NPRM ¶ 40)

- A. ***Designating a single, nationwide channel manager is the best way to ensure the consistent, efficient and fair management of AeroMACS channels.***

1. Use of a single, nationwide channel manager will provide AeroMACS users with one point of contact and will ensure nationwide consistency for access to AeroMACS spectrum. Eligible users will save time and money that otherwise would be spent negotiating different allocation and interference procedures at each airport.
2. Use of a single, nationwide channel manager will maximize the efficient use of spectrum, enabling AeroMACS to meet the unique needs of each location.
 - a. Communications needs vary from airport to airport based on a number of factors, including an airport's size and the region of the country in which the airport is located. The channel manager will allocate channels between non-Federal AeroMACS users to maximize efficient use of the spectrum at each airport.
 - b. The channel manager also will help coordinate AeroMACS spectrum access with federal users. This coordination will ensure the efficient use of AeroMACS spectrum by employing sharing approaches tailored to the needs of the federal and non-federal AeroMACS users at each airport.
3. Use of a single, nationwide channel manager will ensure fair management of AeroMACS channels on a non-discriminatory basis to all eligible AeroMACS users.
4. To further ensure fair management of AeroMACS channels, the FCC should designate as channel manager an entity that is impartial, an expert in AeroMACS technology and applications, and a non-profit.

IV. COORDINATION WITH OTHER AUTHORIZED USERS (NPRM ¶¶ 41-43)

- A. **A channel manager will help promote coordination with other authorized users of the band and will serve as the single point of contact for non-Federal AeroMACS users should any coordination issues arise with these other authorized users of the band.**

V. LICENSING AND COORDINATION (NPRM ¶¶ 37, 39)

- A. ***The Commission should propose flexible licensing and coordination rules will promote robust deployment of AeroMACS services and applications.***
- B. The proposed licensing rules would impose unnecessary costs on AeroMACS users that will constrain the deployment of AeroMACS.

1. The proposed requirement for individual licensing of fixed, base and mobile AeroMACS units is unnecessary and onerous.
 2. The location information gained from such an individual licensing regime will already be available with the channel manager, who will use such information in coordinating the use of AeroMACS spectrum at each airport. A requirement for users to also make this location information available through the FCC's Universal Licensing System is duplicative and administratively burdensome.
 3. Rather than requiring such a difficult individual licensing regime, AeroMACS operations should be licensed by rule. Such an approach would be more administratively efficient and will encourage robust deployment and availability of AeroMACS services and applications.
- C. The proposed coordination rules similarly would impose unnecessary delays and costs on AeroMACS users.
1. The proposal to require pre-coordination of AeroMACS deployments with FAA Regional Offices will impose significant delays and costs on AeroMACS users.
 2. Coordination with federal AeroMACS users will be performed by the channel manager. One of the channel manager's central roles will be to coordinate AeroMACS spectrum use between federal and non-federal users.
 3. Rather than impose a coordination requirement that is duplicative of the coordination that will be performed by the channel manager, the Commission should reject a pre-coordination requirement on individual licensees. Coordination by the channel manager will be more efficient and expedient.

VI. TECHNICAL RULES (NPRM ¶ 44)

- A. **Due to the international nature of AeroMACS services, which requires the adoption of technical rules that mirror those standards approved by international technical standards bodies such as the International Civil Aviation Organization (ICAO). The FCC should adopt the proposed technical rules based on the requirements currently incorporated in the ICAO Standards and Recommended Practices and in the RTCA Minimum Operational Performance Standards.**

VII. CONCLUSION

Eonti submits these comments in support of the NPRM content (WT Docket No. 19-140). Eonti is committed to the continued support of the AeroMACS standard and encourages any licensing and implementation rules that expedite AeroMACS deployment at airports worldwide.

Respectfully submitted,

OSCAR G. MARCIA

By: _____

Oscar G. Marcia
CEO and President
Eonti Inc.

1-720-470-9294 (c)
oscar@eonti.com
www.eonti.com

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